

Attachment A
IRA Work Plan:
Communications

IRA Work Plan: Communications

Prepared for
The Dow Chemical Company

47 Building
Midland, Michigan 48667

February 2004

CH2MHILL

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Acronyms and Abbreviations

Dow	The Dow Chemical Company
IRA	Interim Response Activity
MDEQ	Michigan Department of Environmental Quality

IRA: Communications

1. Introduction

This work plan describes an Interim Response Activity (IRA) for developing communications mechanisms to inform the public of the activities associated with The Dow Chemical Company's (Dow) offsite corrective action work in and along the Tittabawassee River, as well as general information about dioxins/furans and steps to take to reduce the potential for exposure. This IRA is being implemented pursuant to Condition XI.B.3.(a) of the Hazardous Waste Facility Operating License issued to The Dow Chemical Company on June 12, 2003 by the Michigan Department of Environmental Quality (MDEQ) as well as the following MDEQ comments in the December 12, 2003, Notice of Deficiency:

- Comment # 5 regarding development of public information materials
- Comment # 6 regarding community information centers
- Comment #7 regarding disturbance of soils in areas with potential dioxin/furan contamination
- Comment #30 and #31 regarding advisory signage at public parks and unofficial public high use areas
- Comment #33 regarding management of contaminated dredged sediments and disturbed soil

This work plan presents the following information:

- The objectives of the IRA
- A description of the approach to the IRA
- A description of the IRA area
- Identification of access needs and agreements
- Project schedule
- List of contacts
- Detailed work plans for each IRA task (included as appendices)

2. Overall IRA Objectives

In general, IRAs are short-term actions taken to control ongoing risk while site characterization is underway or before a final remedy is selected. Therefore, the primary objective of this IRA is to identify and if necessary mitigate potential human exposures during this interim period prior to commencement of the RI. More specifically, this IRA will:

- Provide information on the potential risks associated with exposure to dioxins/furans and practical measures that can be taken to mitigate those risks.
- Provide information about the activities associated with Dow's offsite corrective action work in and along the Tittabawassee River.
- Provide for notification to the public about the potential presence of dioxin/furan contaminated soils in public use areas.

3. IRA Task Summary

The following sections describe the individual tasks that will be completed as part of this IRA. Task Work Plans, in sufficient detail to be immediately implemented, are provided in Appendices A to D.

3.1 Public Information Materials

The primary objective of this IRA is to prepare public information materials that are easy-to-read, contain relevant educational information about dioxins/furans and the corrective action process, and provide straight-forward suggestions for limiting potential exposures. The materials produced will be submitted to MDEQ for approval prior to distribution to the general public. The work plan for developing Public Information Materials is presented in Appendix A.

3.2 Community Information Centers

The primary objective of this IRA is to establish Community Information Centers in Midland and Saginaw Counties, Michigan, that will:

- Provide written information to the public about the activities associated with Dow's offsite corrective action work in and along the Tittabawassee River
- Be located in high-traffic areas of each township
- Be open and accessible at convenient hours for the public

The work plan for Community Information Centers is presented in Appendix B.

3.3 Activity Advisory: Disturbance and Management of Soils and Sediment in Areas with Potential Dioxin/Furan Contamination

The objectives of this IRA are to:

- Develop an approach for notifying workers and the general public of precautions to be taken when coming in contact with soils or sediments potentially contaminated with dioxins/furans in the Tittabawassee River Floodplain.

- Provide technical information to local governments, companies, and residents to assist them in managing soils or sediments from the Tittabawassee River and its floodplain.

The work plan for Disturbance and Management of Soils and Sediment in Areas with Potential Dioxin/Furan Contamination is presented in Appendix C.

3.4 Advisory Signage at Public Parks, Unofficial Public High Use Areas, and Public Access Fishing Sites

The primary objective of this IRA is to develop signage advising the general public of the potential for exposure to dioxins and furans in soils and sediments at public parks, unofficial public high use areas and public access fishing sites. Parks that have been identified by MDEQ for the placement of signs include Imerman Memorial Park, West Michigan Park, Freeland Festival Park, Caldwell Boat Launch, and Center Road Boat Launch. MDEQ has also identified “unofficial high public use” areas for placement of signs, including Dice Road pumping station, Smith’s Crossing area, Germania Golf Course, Greenpoint Nature Center, and Shiawassee National Wildlife Refuge. The work plan for Advisory Signage at Public Parks, Unofficial Public High Use Areas, and Public Access Fishing Sites is presented in Appendix D.

4. Overall IRA Schedule

The IRA will be completed on the schedule shown in Attachment G.

5. Contacts

The following contacts are identified for this IRA.

Dow
Ben Baker
Senior Environmental Project Leader
47 Building
Midland, MI 48667
989-636-0787

CH2M HILL
Gary Dyke
Project Manager
1111 Washington Street
Midland MI, 48640

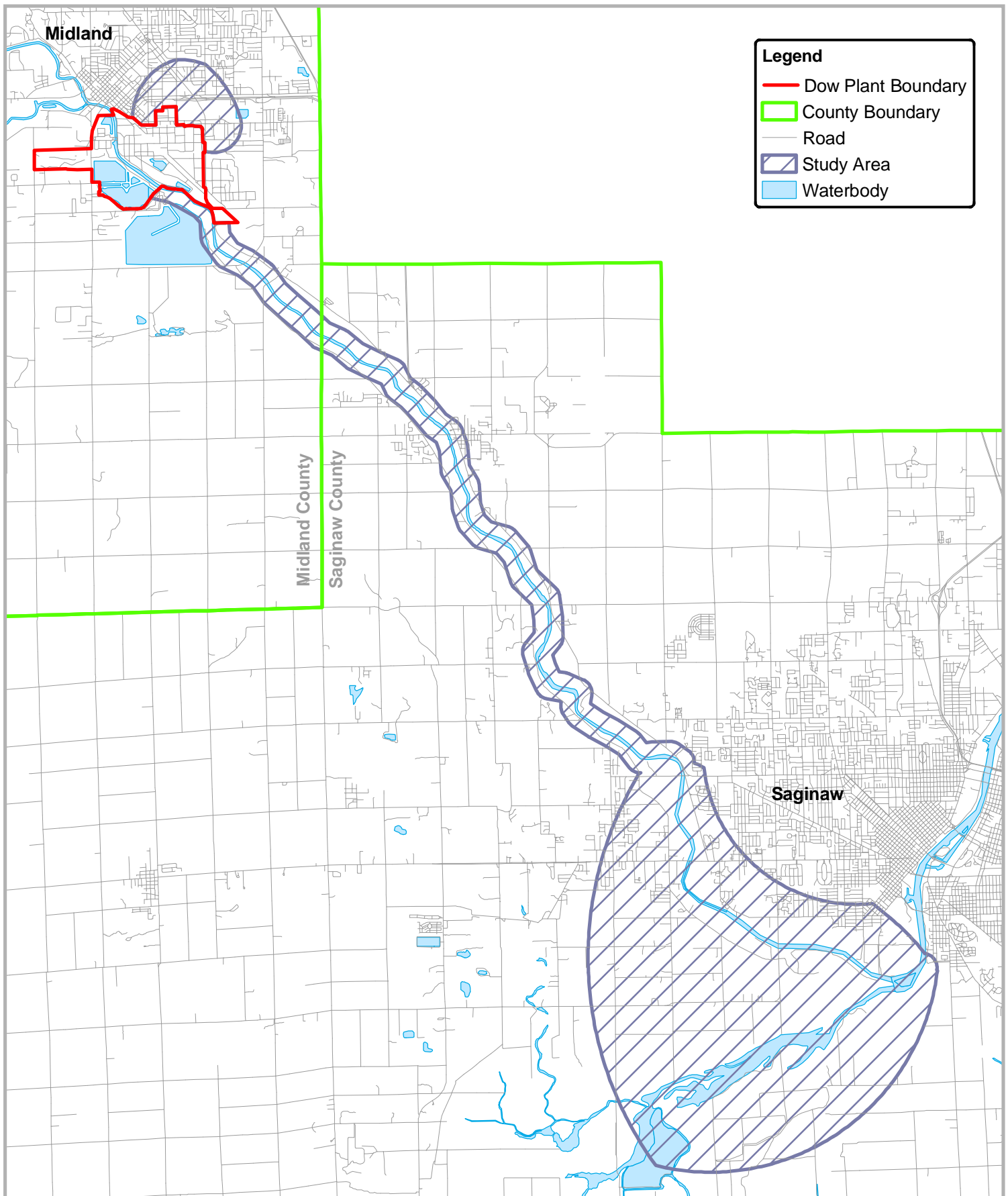


Figure 1
Site Location
Communications IRA
Dow Midland Offsite Corrective Action Program

Appendix A
Work Plan for Public Information Materials

IRA Work Plan: Communications

Work Plan for Public Information Materials

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Acronyms and Abbreviations

ATSDR/CDC	Agency for Toxic Substance and Disease Registry/Center for Disease Control
Dow	The Dow Chemical Company
IRA	Interim Response Activity
MDA	Michigan Department of Agriculture
MDCH	Michigan Department of Community Health
MDEQ	Michigan Department of Environmental Quality
USEPA	U.S. Environmental Protection Agency
WIN	Saginaw Bay Watershed Initiative Network

Work Plan for Public Information Materials

1. Objectives

This work plan is part of an Interim Response Activity (IRA) for developing communications mechanisms to inform the public of the activities associated with The Dow Chemical Company's (Dow) offsite corrective action work in and along the Tittabawassee River, as well as general information about dioxins/furans and steps to take to reduce the potential for exposure. The IRA is being implemented pursuant to Condition XI.B.3.(a) of the Hazardous Waste Facility Operating License issued to Dow on June 12, 2003, by the Michigan Department of Environmental Quality (MDEQ) and addresses the following MDEQ comments in the December 12, 2003, Notice of Deficiency:

- Comment # 5 regarding development of public information materials

The primary objective of this Work Plan for Public Information Materials is to prepare public information materials that are easy-to-read, contain relevant educational information about dioxins and furans, the corrective action process, and provide straight-forward suggestions for limiting potential exposures to dioxins/furans. The materials produced would be approved by MDEQ prior to distribution to the general public.

2. Description of Approach

2.1 Approach for Developing Materials

Public information materials are best prepared and distributed by a third-party organization that is independent to enhance community acceptance, provide resource management, and lead a process that is acceptable to stakeholders. This organization should have the following characteristics:

- Represent a broad range of interests
- Be a local organization with knowledge of local issues affecting the community
- Have a reputation for integrity on issues affecting the community

Dow recommends the Saginaw Bay Watershed Initiative Network (WIN) because it is an established multistakeholder organization whose mission is consistent with this work.

WIN is a voluntary, nonregulatory partnership created to enhance the quality of life in the Saginaw Bay Watershed by creating regional networks of on-the-ground projects that demonstrate sustainability. The networks consist of communities, conservation groups, foundations, and businesses working together to enhance the Saginaw Bay Watershed and create a more sustainable future for all of its inhabitants. WIN has brought people and resources together to balance environmental, economic, social, recreational, and historic priorities, and to leverage ideas and resources toward a common goal—the greater good of future generations. WIN has launched projects to protect habitat, improve access to the bay, foster nature-based tourism, inform people about nonpoint source pollution and support sustainable agriculture. Additional information about WIN is available at:

<http://www.saginawbaywin.org/> or by contacting:

Saginaw Bay Watershed Initiative Network
Mike Kelly
Project Coordinator
PO Box 111
Auburn, MI 48611
(989) 662-6024
Toll-Free: 1-877-ASK-4WIN
Fax: 989-662-6065 E-mail: kellym@conservationfund.org

Upon approval of the IRA: Communications, Dow and MDEQ will formally request WIN (or other mutually agreed upon party) to assume this role and develop a specific proposal. This proposal will include the process for developing these materials, and specify that MDEQ approval of the materials will be required prior to distribution.

2.2 Informational Materials to be Developed

The public informational materials that will be prepared will consist of a series of easy-to-read pamphlets with a coordinated look, size, and approach. The series is proposed to include the following pamphlets:

- Backgrounder: Dioxins and Furans
- Backgrounder: Corrective Action Process
- Backgrounder: Health Questions - Dioxins and Furans
- Guidance: Reducing Exposure at Homes and Parks
- Guidance: Reducing Exposure from Agricultural Activities
- Guidance: Reducing Exposure for Workers
- Guidance: Management of Disturbed Soils and Dredged Sediments
- Fish Advisory for Tittabawassee River

The content of these advisories will be consistent with advisories and informational materials that have already been published by the MDEQ, Michigan Department of Agriculture (MDA), and Michigan Department of Community Health (MDCH). In addition to the publications noted above, the following resources may be used to provide source material for the materials to be developed:

- MDEQ
- MDCH
- MDA
- MDNR
- U.S. Environmental Protection Agency (USEPA)
- Agency for Toxic Substances and Disease Registry (ATSDR)/ Center for Disease Control (CDC)

The general content of these brochures is described in the following sections.

Backgrounder: Dioxin and Furans

This pamphlet will provide general information from the scientific community describing what dioxins and furans are, how they are created, and the general properties of this class of compounds. The information will be presented in a simple, easy-to-understand manner such that the basic properties can be understood by the general public.

Background: Corrective Action Process

This pamphlet will provide information on the corrective action process as required under the Dow Operating License and consistent with Michigan Part 111 and Part 201 requirements. The pamphlet will provide examples of how the process works as well as a graphical representation of the process such as a flow chart and/or example timeline.

Background: Dioxins and Furans Health Questions

This pamphlet will provide general information on health questions associated with dioxins and furans. It will seek to provide a balanced perspective of this controversial topic and will draw upon material from respected institutions and governmental agencies.

Guidance: Reducing Exposure at Homes and Parks

This pamphlet will provide practical guidance for reducing potential exposures to dioxins and furans at home and in settings such as public parks.

Guidance: Reducing Exposure from Agricultural Activities

This pamphlet will provide guidance for reducing potential exposures from agricultural activities in the Tittabawassee River Floodplain. Guidance will be consistent with the MDA publication "Food, Farming and Gardening Guidelines for Minimizing Dioxin Exposure." Information will also be provided on how to take measures to reduce dust during tilling operations, such as use of no-till methods. Information will also be provided about Michigan's Conservation Reserve Enhancement Program (CREP) program as contained in the MDA publication "*About CREP: A Unique Program and Opportunity*" whereby farmers can take cropland out of production.

Guidance: Reducing Exposure for Workers

This pamphlet will provide general information describing practical steps that workers can take to reduce potential exposures to soils potentially contaminated with dioxins and furans. The pamphlet will be targeted toward excavation and dust-generating activities in and along the Tittabawassee River.

Guidance: Management of Disturbed Soils and Dredged Sediments

This pamphlet will provide general information describing, the following:

- Methods for controlling or reducing potential dioxin exposure from contaminated soils.
- Procedures for identifying needed permits, steps for completing permit applications, points of contact with the MDEQ for each type of permit, and identification of fees and time required for completion of each permit application process.
- Description of options for management of contaminated soils. These options may include procedures for reuse of soils on the property, or procedures for offsite disposal, including a list of appropriate disposal facilities.

Fish Advisory for Tittabawassee River

This pamphlet will provide information regarding potential exposures resulting from the consumption of fish caught in the Tittabawassee River in the stretch between Midland and the confluence with the Shiawassee River. Information presented will be consistent with the MDCH publication "2003 Michigan Family Fish Consumption Guide: Important facts to know if you eat Michigan fish," but specific to the Tittabawassee River.

2.3 Distribution of Public Information Materials

The Public Information Materials are intended for distribution by various methods. These may include, but are not limited to, the following:

- Distribution at the Community Information Centers;
- Direct mailing or distribution of select brochures as specified under the IRA Work Plan Disturbance & Management of Soils in Areas with Potential Dioxin Contamination
- Distribution of select brochures associated with the IRA Work Plan Advisory Signage at Public Parks and Unofficial Public High Use Areas and public fishing access sites
- Direct mailing or distribution of select brochures as determined under the IRA Work Plan for the Tittabawassee River Floodplain
- Placed on various web-based sites

3. Schedule

The schedule for the development of Public Information Materials is presented in Attachment C to the SOW Midland Area Soils and Attachment G to the SOW Tittabawassee River Sediments and Floodplain. Work will be initiated upon approval of this IRA Work Plan by MDEQ. The basic steps the schedule includes:

- Dow and MDEQ to request WIN (or other third party) to participate and develop proposal (estimated time for letter to organization is 3 weeks)
- MDEQ and Dow review and approval of the WIN (or other third-party) proposal (estimated review and approval time is 3 weeks)
- Preparation of draft informational materials (estimated at 10 to 12 weeks)
- MDEQ review and final approval of informational materials (estimated time of 3 weeks for review, modification, and approval process)
- Printing and publication of brochures (estimated at 2 to 3 weeks)

Appendix B
Work Plan for Community Information Centers

IRA Work Plan: Communications

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Midland, Michigan 48667

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Acronyms and Abbreviations

ATSDR	Agency for Toxic Substance and Disease Registry
Dow	The Dow Chemical Company
IRA	Interim Response Activity
MDA	Michigan Department of Agriculture
MDCH	Michigan Department of Community Health
MDEQ	Michigan Department of Environmental Quality

Work Plan for Community Information Centers

1. Objectives

This work plan is part of an Interim Response Activity (IRA) for developing communications mechanisms to inform the public of the activities associated with The Dow Chemical Company's (Dow) offsite corrective action work in and along the Tittabawassee River, as well as general information about dioxins/furans and steps to take to reduce the potential for exposure. The IRA is being implemented pursuant to Condition XI.B.3.(a) of the Hazardous Waste Facility Operating License issued to Dow on June 12, 2003, by the Michigan Department of Environmental Quality (MDEQ) and addresses the following MDEQ comments in the December 12, 2003, Notice of Deficiency:

- Comment # 6 regarding community information centers

The primary objective of this Work Plan for Community Information Centers is to establish Community Information Centers in Midland and Saginaw Counties, Michigan, that will:

- Provide written materials to the public about the activities associated with Dow's offsite corrective action work in and along the Tittabawassee River
- Be located in high-traffic areas of townships along the Tittabawassee River and in the City of Midland
- Be open and accessible at convenient hours for the public

2. Description of IRA Approach

The Community Information Centers will be established to inform the public about the activities associated with Dow's offsite corrective action work in and along the Tittabawassee River and in Midland. The Community Information Centers will be located in public buildings (township hall or library) that are readily accessible and open at hours that are convenient for the public to use them. Community Information Centers are proposed for the following locations:

Saginaw County

- Saginaw Township Library, 3100 N. Center Road
- Thomas Township at the Thomas Township Library, 8207 Shields Drive
- James Township at the township hall, 6060 Swan Creek Road
- Tittabawassee Township at the township hall, 145 S. Second Street in Freeland

Midland County

- Ingersoll Township at the township hall, 4400 E. Brooks Rd.
- Midland Township and City of Midland at the Grace A Dow Memorial Library, 1710 W. St. Andrews Street, Midland

Figure 1 shows the locations of the proposed Community Information Centers.

The following tasks will be completed to achieve the work plan objectives:

Task 1. Identify and purchase rack system(s) to hold information materials. The rack system will vary depending on the needs and locations available in each facility. The rack systems will be placed in a prominent location in each public building designated for a Community Information Center.

Task 2. Design signage to place above or beside the wall racks to identify the location as a "Community Information Center."

Task 3. Obtain Dow and MDEQ jointly approved information materials that are prepared as part of IRA:Communications – Work Plan for Public Information Materials.

Task 4. Work with MDEQ to determine what additional information materials besides those produced under Task 3 above will be placed in the Community Information Centers. In addition, materials will also include, but are not necessarily limited to the following regulatory documents:

- "Soil Movement Advisory for Private, Public, and Commercial Projects", MDEQ, Michigan Department of Agriculture (MDA), and Michigan Department of Community Health (MDCH)
- "Food, Farming and Gardening Guidelines for Minimizing Dioxin Exposure", MDA
- "2003 Michigan Family Fish Consumption Guide: Important facts to know if you eat Michigan fish", MDCH
- "Dioxins Fact Sheet", MDCH, MDEQ, MDA
- "Toxicological Profile for Chlorinated Dibenzo-p-dioxins (CDDs)", Agency for Toxic Substance and Disease Registry (ATSDR)
- "Public Health Statement for Chlorinated Dibenzo-p-dioxins (CDDs)", ATSDR

Task 5. Work with contacts in each of the Community Information Centers to gain approval and install the racks and to distribute the information materials.

Task 6. Work with contacts in each of the Community Information Centers to restock the racks with public information materials, as needed.

3. Access Needs and Agreements

Access will need to be obtained from the townships and Midland in order to set up the Community Information Centers. The following is the list of contacts:

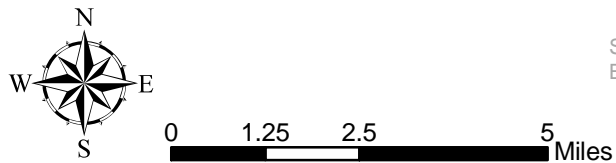
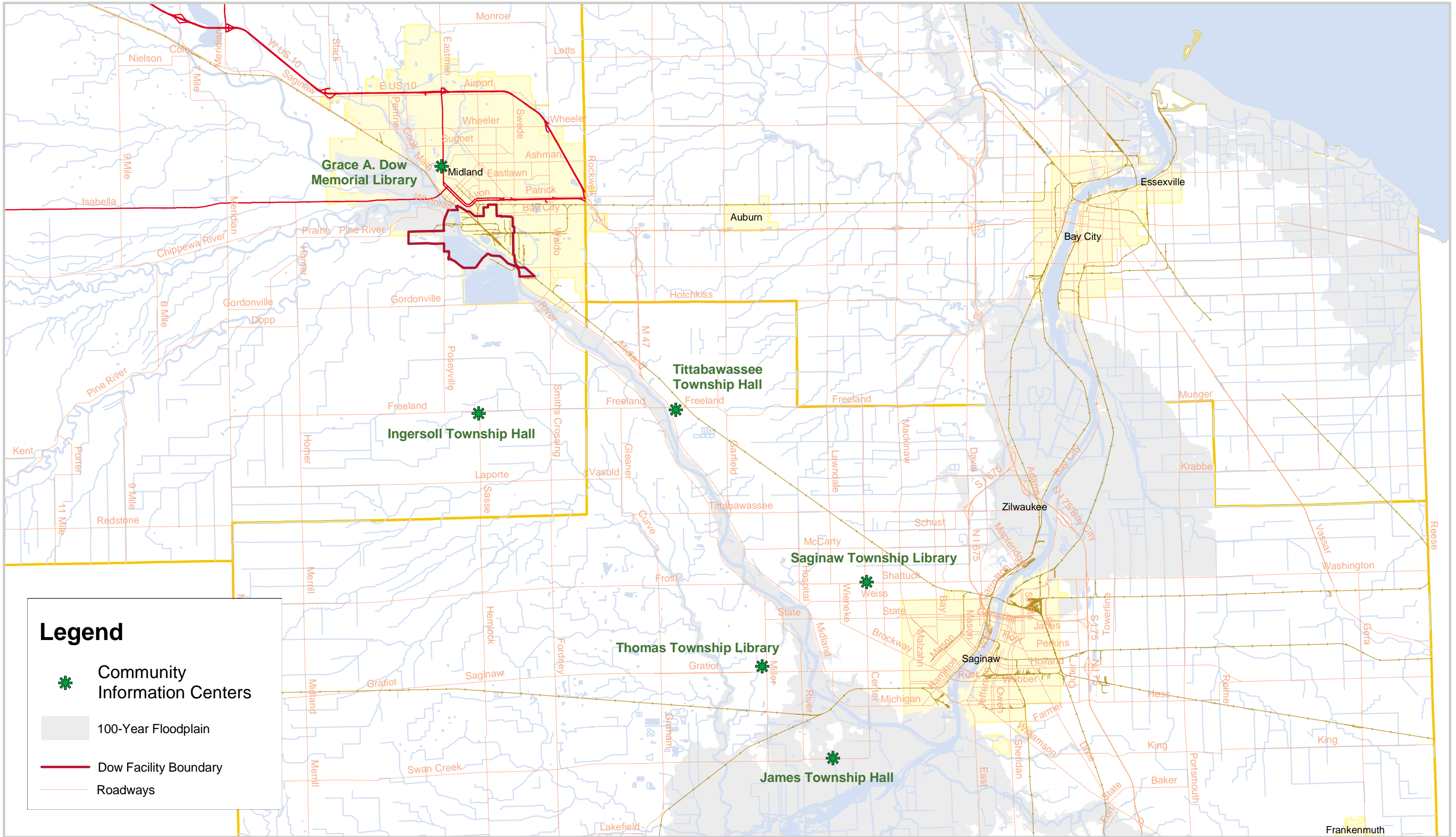
First Name	Last Name	Title	Telephone	Address	City	State	Zip
George	Olson	Saginaw Township Supervisor	989-791-9815	4980 Shattuck	Saginaw	MI	48603
Robert	Weise	Thomas Township Supervisor	989-781-0290	249 N. Miller	Saginaw	MI	48609
Leonard	Ballosh	James Township Supervisor	989-781-1353	6060 Swan Creek	Saginaw	MI	48609

First Name	Last Name	Title	Telephone	Address	City	State	Zip
Kenneth	Kasper	Tittabawassee Township Supervisor	989-695-9512	145 S. Second St. P.O. Box 158	Freeland	MI	48623
Curtis	Shaffner	Ingersoll Township Supervisor	989-835-5289	4400 E. Brooks Rd.	Midland	MI	48640
Karl	Tomion	Midland City Manager	989-837-3301	333 W. Ellsworth	Midland	MI	48640
Tari	Dusek	Director - Thomas Township Library	989-781-3770	8207 Shields Drive	Saginaw	MI	48609
Melissa	Barnard	Grace A. Dow Memorial Library	989-837-3431	1710 W. St. Andrews	Midland	MI	48640
Alice	Houlihan	Saginaw Township Library	989-799-2771	3100 N. Center	Saginaw	MI	48603

Dow has obtained permission from three townships to place Community Information Centers in their township hall (James and Tittabawassee Townships) or library (Thomas Township). Documents relating to the Dow Michigan Operations License and associated Corrective Actions are already located at the Grace A. Dow Library in Midland and at the Saginaw Township Library in Saginaw. Dow will seek permission from these libraries to add these additional informational materials to the depositories. Dow will also contact Ingersoll Township to seek permission to place informational materials at its township hall.

3. Schedule

The projected date for completion of the Community Information Centers is April 2004. At that time, the locations will be approved and the racks will be in place and ready to stock with appropriate materials. The schedule is presented in Attachment C to the SOW Midland Area Soils and Attachment G to the SOW Tittabawassee River Sediments and Floodplain.



Source Information:
Base mapping from State of Michigan Center for Geographic Information, Geographic Data Library.

Figure B-1
Location of Community Information Centers
Interim Remedial Actions: Communications Work Plan
Dow Midland Offsite Corrective Action Program

Appendix C
Work Plan for Activity Advisory:
Disturbance and Management of Soils
in Areas with Potential
Dioxin/Furan Contamination

IRA Work Plan: Communications

Work Plan for Activity Advisory: Disturbance and Management of Soils in Areas with Potential Dioxin/Furan Contamination

Prepared for
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February 2004

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Figure

C-1 Site Location

Acronyms and Abbreviations

Dow	The Dow Chemical Company
FEMA	Federal Emergency Management Agency
IRA	Interim Response Activity
MDA	Michigan Department of Agriculture
MDCH	Michigan Department of Community Health
MDEQ	Michigan Department of Environmental Quality

Work Plan for Activity Advisory: Disturbance and Management of Soils in Areas with Potential Dioxin/Furan Contamination

1. Objectives

This work plan is part of an Interim Response Activity (IRA) for developing communications mechanisms to inform the public of the activities associated with The Dow Chemical Company's (Dow) offsite corrective action work in and along the Tittabawassee River, as well as general information about dioxins/furans and steps to take to reduce the potential for exposure. The IRA is being implemented pursuant to Condition XI.B.3.(a) of the Hazardous Waste Facility Operating License issued to Dow on June 12, 2003, by the Michigan Department of Environmental Quality (MDEQ) and addresses the following MDEQ comments in the December 12, 2003, Notice of Deficiency:

- Comment #7 regarding disturbance of soils in areas with potential dioxin/furan contamination

The objectives of this Work Plan for Activity Advisory: Disturbance & Management of Soils in Areas with Potential Dioxin/Furan Contamination are to:

- Develop an approach for notifying workers and the general public of precautions to be taken when coming in contact with soils or sediments potentially contaminated with dioxins and furans within the Tittabawassee River Floodplain.
- Provide technical information to local governments, companies, and residents to assist them in managing soils or sediments from the Tittabawassee River and its floodplain.

Types of information to be provided including:

- Measures to reduce potential human exposure.
- Procedures for streamlining and simplifying preparation of permits required for disturbance of soil or sediment
- Options for management for disposal of stockpiled soil or sediment

Technical guidance developed from the implementation of this IRA will be disseminated through various mechanisms as described in the following sections.

2. Description of Approach

2.1 Identification of Areas that May Contain Elevated Concentrations of Soil Contaminants

The Tittabawassee River Floodplain has been identified for this IRA based on the results of limited prior environmental sampling data collected by the MDEQ that indicate that dioxins

and furans have been detected in some soils and sediments in the estimated 100-year floodplain along the Tittabawassee River. The area for this IRA includes property within the 100-year floodplain, as currently estimate by the Federal Emergency Management Agency (FEMA), along the Tittabawassee River commencing at the upstream boundary of Dow's Midland facility and continuing to the confluence with the Shiawassee River in Saginaw County. This area is shown graphically in Figure 1.

However, it is important to note that the accuracy of the current FEMA maps is restricted by limitations in accuracy of existing topographic maps and the modeling FEMA performed to estimate the 100-year floodplain; therefore it is possible the IRA may be modified in the future, with MDEQ approval, if more accurate information becomes available.

2.2 Notification Process

Information on potential hazards and precautions that should be taken when disturbing soils or sediments in the above areas of potential contamination will be distributed as follows:

1. Written materials describing precautions that can be taken by individuals disturbing soils will be mailed to residents living within the area identified in Section 2.1.
2. Dow will work with the "Miss Dig" program to determine if they are willing and/or able to provide Dow with a notification of excavation activities that are planned within the areas identified above. If "Miss Dig" is willing to participate in this activity, the general process to be proposed would be that when "Miss Dig" receives an excavation request, Dow (or Dow-retained firm) will be contacted. Dow (or Dow-retained firm) will send informational materials directly to entities preparing to excavate in the areas identified above. However, it is important to note that these notifications are not part of the "Miss Dig" charter, and they are not obligated to participate in the notification process proposed herein.
3. Dow will work with the cities and townships in Saginaw and Midland counties to determine if they are willing and/or able to provide information packets to entities that make a request for a building permit. It is important to note that these notifications are not a responsibility of these cities or counties, and they are not obligated to participate in the notification process proposed herein.
4. Informational materials will be placed in the Community Information Centers.

2.3 Informational Materials

Informational materials to be provided include the following pamphlets that will be developed under the IRA: Communications—Work Plan for Public Information Materials:

- Background: Dioxins and Furans
- Background: Health Questions—Dioxin and Furans
- Guidance: Reducing Exposure for Workers
- Guidance: Management of Disturbed Soils and Dredged Sediments

The general content of these pamphlets is described in the IRA: Communications— Work Plan for Public Information Materials.

3. Schedule

The schedule is presented in Attachment C to the SOW Midland Area Soils and Attachment G to the SOW Tittabawassee River Sediments and Floodplain. The basic components of the schedule include the following:

- Prepare maps for initial review with MDEQ immediately following development of topographic and floodplain maps, estimated to be available in April 2004.
- Following approval of this IRA and work plan, finalize discussions with “Miss Dig” program to determine if the program can be used for information distribution (estimated duration of this process is 8 weeks).
- Following approval of this IRA and work plan, begin discussions with city/township building departments to determine if information can be distributed with building permits (estimated duration of this process is 8 weeks).
- Upon review and approval of the mapped area by MDEQ, prepare a list of Midland and Saginaw county residents that will be mailed pamphlets (estimated duration is 2 weeks).
- Submit mailing list to MDEQ for final approval (estimated review/approval time is 3 weeks).
- Mail pamphlets immediately following completion of preparation of materials (under IRA: Communications–Work Plan for Public Information Materials) and MDEQ approval.
- Distribute pamphlets to city/township building departments following completion of preparation of materials (under IRA: Communications–Work Plan for Public Information Materials) and MDEQ approval.

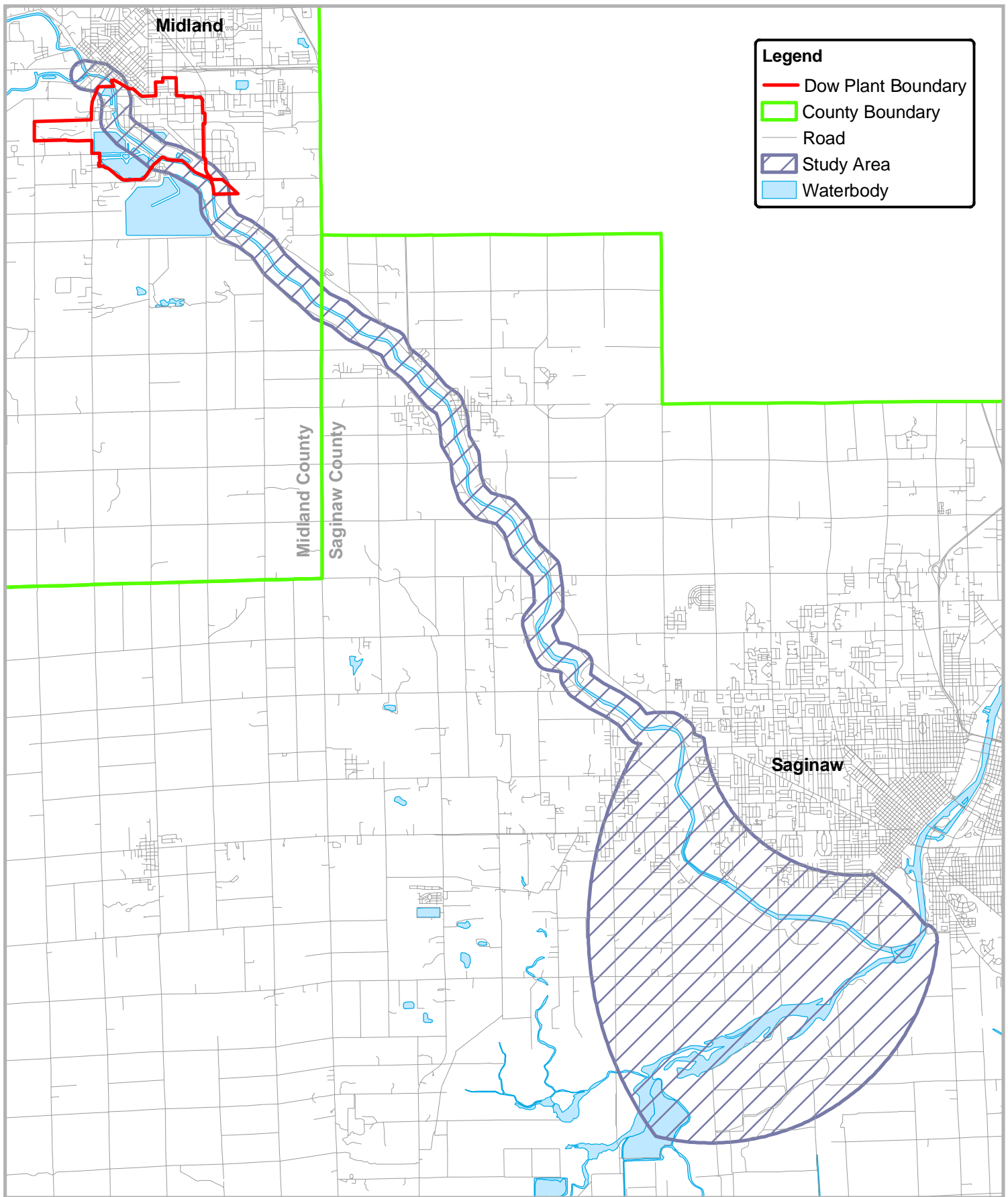


Figure C-1
Site Location
Tittabawassee River IRA
Dow Midland Offsite Corrective Action Program

Appendix D
Work Plan for Advisory Signage at Public
Parks, Unofficial Public High Use Areas, and
Public Access Fishing Sites

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Attachment 1: Sample Escrow Agreement

Acronyms and Abbreviations

Dow	The Dow Chemical Company
IRA	Interim Response Activity
MDCH	Michigan Department of Community Health
MDEQ	Michigan Department of Environmental Quality

Work Plan for Advisory Signage at Public Parks, Unofficial Public High Use Areas, and Public Access Fishing Sites

1. Objectives

This work plan is part of an Interim Response Activity (IRA) for developing communications mechanisms to inform the public of the activities associated with The Dow Chemical Company's (Dow) offsite corrective action work in and along the Tittabawassee River, as well as general information about dioxins/furans and steps to take to reduce the potential for exposure. The IRA is being implemented pursuant to Condition XI.B.3.(a) of the Hazardous Waste Facility Operating License issued to Dow on June 12, 2003, by the Michigan Department of Environmental Quality (MDEQ) and addresses the following MDEQ comments in the December 12, 2003, Notice of Deficiency:

- Comment #30 and #31 regarding advisory signage at public parks, unofficial public high use areas, and public access fishing sites.

The primary objective of this Work Plan is to develop signage advising the general public of the potential for exposure to dioxins and furans in soils and sediments at public parks, unofficial public high use areas, and public access fishing sites. Parks that have been identified by MDEQ for the placement of signs include Imerman Memorial Park, West Michigan Park, Freeland Festival Park, Caldwell Boat Launch, and Center Road Boat Launch. MDEQ has identified "unofficial high public use" areas for placement of signs, including Dice Road pumping station, Smith's Crossing area, Germania Golf Course, Greenpoint Nature Center, and Shiawassee National Wildlife Refuge.

2. Description of Approach

The following process will be used to achieve the objective stated above.

MDEQ and Michigan Department of Community Health (MDCH) are best suited to determining the content, design, and placement of the proposed warning signs. To facilitate and expedite placement of the signage Dow will establish an escrow account to fund the construction and placement of signs designed by MDEQ and/or MDCH.

The overall approach to providing warning signs will involve the following steps:

1. Dow will meet with MDEQ to determine the preliminary design and approximate number of signs that will be required to determine the funding level for the escrow account.
2. An escrow agreement will be put in place and will contain an approach for disbursement of funds from the escrow account, once the overall approach to implementation of the IRA, this work plan, and associated cost estimate, have been developed. An example escrow agreement is contained in Attachment 1.

3. Access Needs and Agreements

Access to private property or public rights of way will be obtained by MDEQ or MDCH as necessary.

4. Schedule

The schedule is presented in Attachment C to the SOW Midland Area Soils and Attachment G to the SOW Tittabawassee River Sediments and Floodplain. The basic components of the schedule include the following:

- Within 2 weeks following approval of this IRA Work Plan, set up an initial meeting with MDEQ to discuss overall approach for implementation of this IRA, as a basis for developing a cost estimate.
- Set up escrow account (estimated duration of 8 weeks).

The schedule for development and placement of the signs will be determined by MDEQ and is not part of this work plan.

SAMPLE FORM ESCROW AGREEMENT

This agreement is made on _____, 2004, by The Dow Chemical Company ("Dow"), and [Bank] _____ ("Escrow Agent"), for the benefit of the Michigan Department of Environmental Quality ("MDEQ") and concerns the payment for certain activities related to Dow's Interim Remedial Action Plan ("Plan"), dated _____, approved by MDEQ on _____, 2004, Michigan a copy of which is in Exhibit A, upon the following terms and conditions.

1. Escrow Agent's Duties. Escrow Agent shall hold in trust all money provide to it by Dow and make disbursements of such money to MDEQ as set forth herein.
2. Dow's Duties. Dow has delivered into escrow with Escrow Agent the sum of _____ Dollars (\$_____) in certified funds in compliance with the terms of the Plan, which funds will be placed in a designated Escrow Account.
3. Delivery of Money to MDEQ. If MDEQ expends funds on the design, production or installation of warning signs as provided for in Section ____ of the Plan and provides Escrow Agent with receipts or other proof of the costs incurred in such activities by or on behalf of MDEQ, Escrow Agent shall reimburse MDEQ for such costs from the escrow account, to the extent the escrow account has sufficient funds.
4. Refund of Money to Dow. If any funds remain in the escrow account on the ____ anniversary of the execution of this agreement, any remaining funds shall be provided to Dow, unless the parties otherwise modify this agreement in writing.
5. Reliance by Escrow Agent. Escrow Agent shall not be responsible for the authenticity of any document or signature and may rely exclusively on, and shall be protected when acting on, any notice, affidavit, request, consent, instruction, check, or other document believed by it in good faith to be genuine, to be signed or presented by the proper person, duly authorized, or properly made. Escrow Agent shall have no responsibility except for the performance of its express duties stated in this agreement, and no additional duties shall be inferred or implied under this agreement.
6. Fees. Escrow Agent shall be paid a fee of \$_____, which shall be paid by _____ on the effective date of this agreement.
7. Effective Date. This agreement shall become effective as of the last date on which the parties listed below have signed this agreement.

THE DOW CHEMICAL COMPANY

Dated: _____

ESCROW AGENT:

Dated: _____